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In Propria Persona

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

TODD R. G. HILL, et al,

Plaintiffs

vs.

THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND INDIVIDUALS OF THE PEOPLES COLLEGE OF LAW, et al.,

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

NOTICE OF COMPLETION OF LOCAL RULE 7-3 CONFERENCE REGARDING CONTEMPLATED VEXATIOUS LITIGANT MOTION; NOTICE OF MATERIAL PROCEDURAL IRREGULARITIES

NO ORAL ARGUMENT REQUESTED

NOTICE OF COMPLETION OF LOCAL RULE 7-3 CONFERENCE REGARDING CONTEMPLATED VEXATIOUS LITIGANT MOTION; NOTICE OF MATERIAL PROCEDURAL IRREGULARITIES

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this notice to inform the Court that the Local Rule 7-3 meet-and-confer process concerning Defendants' contemplated motion to declare Plaintiff a vexatious litigant has concluded without resolution. This notice is submitted in furtherance of judicial economy, case management integrity, and to ensure a complete record of material procedural events.

Plaintiff respectfully notes that the attached correspondence raises serious procedural concerns, including defense counsel's apparent predetermination of the contemplated motion and a pattern of extrajudicial hostility. Plaintiff submits this for the Court's awareness in evaluating the context and propriety of any forthcoming filing

Attached hereto as Exhibits A, B, and C are complete copies of the referenced email communications. These materials are submitted in full for the convenience of the Court and to establish a clear evidentiary record regarding the procedural conduct surrounding the contemplated motion. Each exhibit is referenced herein and indexed for ease of judicial review.

Exhibit A:

July 14–15, 2025 Email Chain between Plaintiff and Haight Counsel

(Includes admission by Ms. Harvey that the VL motion was "fully prepared" prior to the LR 7-3 conference.)

Exhibit B:

April 2025 Email Chain between Plaintiff and Haight Counsel

(Submitted previously in support of Dkt. 264 as evidence in support of prior failure to meet and confer and coordinated delay tactics.)

Exhibit C:

June–July 2025 Emails from Defendant Spiro to Plaintiff

Plaintiff makes no request for relief at this time, but provides this notice solely to assist the Court in evaluating the procedural posture and ensuring complete context.

Respectfully submitted,

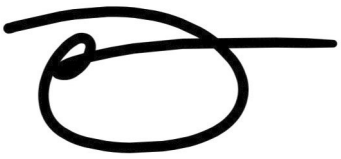
Dated: July 17, 2025

Todd R. G. Hill
Plaintiff, In Propria Persona

STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 281 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,



July 17, 2025
Todd R.G. Hill

Plaintiff, in Propria Persona

Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,

July 17, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

DECLARATION OF TODD R. G. HILL

I, Todd Hill, declare as follows:

1. I am the Plaintiff in the above-captioned matter. I have personal knowledge of the facts stated herein and could testify competently thereto if called.
2. Attached hereto as Exhibits A, B, and C are true and correct copies of email communications I received from, sent to, or discussed with defense counsel in relation to the Local Rule 7-3 conference regarding Defendants' contemplated motion to declare me a vexatious litigant.
3. These communications accurately reflect the content and context of those interactions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 17th day of July, 2025, in Belton, Texas.

Todd R.G. Hill
Plaintiff, in Propria Persona

EXHIBIT A

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

Hill v. People's College of Law/Case No. Case No. 2:23-cv-01298-JLS-CFM - Meet and Confer

4 messages

Harvey, Allison <aharvey@hbblaw.com> Mon, Jul 14, 2025 at 10:33 AM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>, Ira Spiro <ira@spirolawcorp.com>

Dear Mr. Hill,

We write pursuant to Local Rule 7-3 to meet and confer with you regarding Defendants' intention to file a motion to declare you a vexatious litigant in this matter. This motion will be brought jointly by the People's College of Law and related defendants, and Defendant Ira Spiro.

This motion is based on the extensive record in this case, including excessive, repetitive, and improper filings, misuse of procedural rules, and conduct that has significantly burdened and harassed Defendants, their counsel, and the Court. The contemplated motion will seek an order declaring you a vexatious litigant under the Court's inherent authority, Local Rule 83-8, 28 U.S.C. § 1651(a), and California Code of Civil Procedure sections 391-391.8 (as incorporated through Local Rule 83-8.4), and will request appropriate pre-filing restrictions requiring you to obtain leave of court before initiating any new filings and will also request that you be ordered to furnish $5,000 in security to cover defense fees and costs incurred as a result of continued excessive litigation conduct.

The record shows more than 340 docket entries to date-many of which are duplicative, procedurally deficient, or directed at collateral issues. These include multiple amended complaints that have been dismissed for failure to comply with Rule 8; repeated attempts to relitigate the same issues; and filings with titles such as "Notice of Procedural Preservation and Pattern of Record Suppression" and "Third Plaintiff's Notice of Constructive Denial and Pending Requests for Judicial Notice," which appear to seek commentary on the Court's docket activity. The motion will also address numerous incidents where you have refused to engage in straightforward meet and confer discussions unless Defendants provided detailed legal outlines or pre-drafted motion content-conditions not required by Local Rule 7-3. In addition, the motion will include references to pleadings where you have shifted focus from litigating claims to repeatedly targeting defense counsel personally.

We are conducting this meet and confer via email due to the nature of the motion and prior course of our communications. Previous efforts to conduct meet and confer discussions by phone or in person have proved challenging and largely unproductive. Furthermore, the Central District has recognized that email correspondence will satisfy Local Rule 7-3 when it reflects a substantive and timely effort to address the contemplated motion. *Gibson Brands, Inc. v. John Hornby Skewes & Co., Ltd.,* 2014 WL 4187979 (C.D. Cal. Aug. 22, 2014); *Meggs v. NBCUniversal Media, LLC,* 2017 WL 2974916 (C.D. Cal. July 12, 2017).

In both *Gibson Brands* and *Meggs,* the Court emphasized substance and timing over form and held that email-based meet and confer efforts may comply with LR 7-3 where they provide meaningful notice and opportunity for dialogue. Here, we are reaching out more than seven days in advance of filing and are providing the core basis and relief sought in our intended motion.

Please confirm whether you intend to oppose the motion and whether you are willing to engage in a substantive discussion via this email exchange. Should you wish to respond to the substance of the motion or propose a resolution, please do so in writing no later than 5:00 p.m., Wednesday, July 16, 2025. Absent a resolution, we intend to file the motion no later than the end of next week, dependent upon our meet and confer efforts this week.

Best regards,

Allison

Allison Harvey
Attorney
D: (619) 961-4824
aharveY..@hbblaw.com
Haight
Haight Brown & Bonesteel LLP
402 West Broadway
Suite 1850
San Diego, CA 92101
0: 619-595-5583
F: 619-595-7873
www.hbblaw.com

Todd Hill <toddryangregoryhill@gmail.com> Mon, Jul 14, 2025 at 2:18 PM
To: "Harvey, Allison" <aharvey@hbblaw.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>, Ira Spiro <ira@spirolawcorp.com>

Dear Ms. Harvey, Ms. Jamshidi and Mr. Spiro,

Thank you for your email.

As an initial matter, I received your July 14, 2025 email and acknowledge your stated intent to file a vexatious litigant motion absent "a resolution." However, your communication provides no concrete articulation of what such a resolution would entail, nor does it specify what particular conduct, under the governing legal standards, supports the relief you intend to seek. A vague invitation for me to "propose a resolution" is not a good-faith substitute for Defendants' obligation to substantiate their position during a Local Rule 7-3 conference.

That said, I remain willing to engage in a substantive and good-faith exchange should Defendants wish to clarify what precise relief they seek and on what current procedural basis. I will not, however, agree to unsupported pre-filing restrictions, monetary security, or any procedural limitations premised on a distorted view of the docket history, especially where the previous and operative complaint are Rule 8-compliant and no filing has been deemed frivolous.

If your clients, or Mr. Spiro, are prepared to identify a specific, narrowly tailored proposal rooted in present case posture, not generalized assertions or past volume, I will consider such a proposal in writing.

In response to your additional requests, for the reasons stated below, I categorically oppose your contemplated vexatious litigant motion. My filings reflect disciplined compliance with Court directives, were compelled by Defendants' litigation tactics, and properly preserved critical procedural rights. The contemplated motion is clearly retaliatory, procedurally questionable, and strategically misguided, particularly in light of Defendant Spiro's documented extrajudicial harassment.

Your contemplated motion facially appears to be a desperate attempt to invert the narrative, especially given its timing immediately following Docket 346 and my documented docket integrity concerns. I not only strongly contest the factual and legal basis asserted in your letter, but your attempted framing represents a calculated misrepresentation of the established procedural history of this litigation.

I. The Record Overwhelmingly Refutes a Vexatious Litigant Designation

Your claim that the docket reflects "excessive, repetitive, or improper filings" is not merely an omission of critical context; it is a serious mischaracterization of the procedural record. Nearly all my filings were compelled by Defendants' persistent and often dilatory conduct, the Court's unresolved rulings, or existing procedural ambiguity,

including repeated rounds of Rule 12(b)(6) motions and a consistently piecemeal opposition strategy from Haight and Mr. Spiro.

Defendants' threatened motion rests on a distorted narrative that improperly conflates docket volume with misconduct. The fixation on the number of filings, many of which were directly prompted by Defendants' own motion practice or necessitated by the Court's delayed or incomplete rulings, fails to acknowledge that the Third Amended Complaint was expressly deemed Rule 8--compliant and the Fourth Amended Complaint remains the operative pleading. Your references to prior amendments ignore the procedural posture, your own previous critiques and judicial invitation to clarify claims. Similarly, your objection to filings such as "Notice of Procedural Preservation" and "Constructive Denial Notices" misrepresents these as commentary, when in fact they are narrowly tailored, legally grounded instruments designed to preserve appellate rights amid docket silence. Importantly, these notices have not placed a responsive burden on the Defendants or their counsel and are consistent with the Federal Rules and the procedural posture at the time of filing.

Furthermore, the claim that Plaintiff refused to engage in meet-and-confer discussions unless Defendants provided legal substance misstates the record; Plaintiff has consistently sought meaningful dialogue under Local Rule 7-3, not informal gestures. Moreover, accusations of personal targeting are unsubstantiated and appear designed to shield defense counsel conduct from valid scrutiny. In total, Defendants' reliance on historical procedural volume, rather than the current posture following the Court's endorsement of the TAC relevant to Rule 8 grounds, reveals a tactical effort to chill further oversight and divert attention from the legal deficiencies in your own or defendant conduct.

As you are well aware, and as the docket unequivocally demonstrates:

1. The First Amended Complaint (FAC) was met with substantive Rule 12(b)(6) motions from multiple parties, necessitating a response.
2. The Second Amended Complaint (SAC) was permitted and filed in direct response to those motions and still met with further Rule 12 filings, staggered due to Haight's alleged inability to obtain acceptance of service on behalf of their clients (this resulted in a motion to show cause and Plaintiff's response).
3. The Third Amended Complaint (TAC) was filed after leave was granted and dismissed, notably having been deemed compliant under Rule 8, without prejudice related to four (4) causes of action presented in the yet-to-be ruled upon Fourth Amended Complaint, which did not preclude further curative amendment as it related to Mr. Spiro or the PCL Defendants.
4. The Fourth Amended Complaint (FAC4) similarly responded to procedural directives and clarified claims as requested. The defense again responded with Rule 12 motions.
5. The current Fifth Amended Complaint (5AC), filed under Rule 15(a)(2), directly responds to those motions and incorporates new judicial admissions and evidence not available in prior pleadings.

This is not "vexatious" conduct; it is the disciplined, legally sound, and iterative pleading practice routinely required and expected in complex, multi-defendant federal litigation. Any suggestion otherwise is a profound mischaracterization of federal civil procedure.

A. Defendants' Rejection of Early Resolution Compelled Subsequent Filings

In fact, prior to many of the motions now attempted mischaracterized as "vexatious," I made a clear and timely settlement offer on December 11, 2023, addressed to PCL counsel at Haight, at that time composed of Ms. Davis, Ms. Sherman, and Mr. Zech, offering five specific, reasonable terms to resolve this dispute in its entirety, including indemnification of all parties and a modest sum for court costs and damages. That offer was refused. Had it been accepted, it would have obviated nearly all subsequent filings and procedural escalation. The record shows that it was Defendants, not Plaintiff, who declined early resolution and opted for prolonged litigation.

B. Defense Conduct Reflects a Pattern of Extrajudicial Harassment and Intimidation

More recently, Plaintiff has been compelled to endure a clear pattern of extrajudicial communications from Defendant Ira Spiro, consisting of terse, uncontextualized email messages sent directly to Plaintiff. These messages, which are notably devoid of any professional salutation, signature block, or explanatory text beyond a single, often accusatory or mirroring phrase, are illustrative of conduct designed to harass or intimidate Plaintiff and undermine the proper adversarial process.

These unsolicited communications interfere directly with my litigation preparation, distract from necessary filings, and create undue psychological stress, thus impeding the proper adversarial process.

Specifically, the record shows:

1. On June 17, 2025, Defendant Spiro emailed Plaintiff the phrase "endeavor to effect abject avoidance". This unsolicited communication employs inflammatory language, directly and personally accusing Plaintiff of impropriety without context or justification in a formal meet and confer.

2. In multiple instances, Defendant Spiro has sent emails containing phrases directly extracted from Plaintiff's court filings and legal arguments, without explanation or context. Examples include:

    a. "procedural integrity of the litigation" on June 26, 2025.

    b. "manipulate procedural posture to avoid accountability" on June 28, 2025.

    c. "Signal of procedural integrity" on July 3, 2025.

This pattern of echoing Plaintiff's precise legal terminology in isolated, uncontextualized emails suggests a deliberate intent to mock, ridicule, or sarcastically diminish Plaintiffs legitimate arguments, rather than engage in professional dialogue.

3. On July 8, 2025, Defendant Spiro sent an email simply stating "the design of sophisticated influence". While vague, this type of cryptic communication, in the context of ongoing contentious litigation and preceding aggressive emails and defense filings, can be reasonably perceived as an attempt to create psychological pressure or imply manipulative behavior on Plaintiff's part.

These emails consistently bypass the established Local Rule 7-3 meet and confer processes that require substantive discussion on contemplated motions. Instead, they represent unsolicited, off-record communications that serve no legitimate professional purpose, other than to express personal frustration or exert psychological influence. This directly contradicts the spirit of Local Rule 7-3, which aims for good-faith engagement, not cryptic messages.

Viewed individually, each email might appear minor. However, when aggregated, these five emails sent within a three-week period (June 17 to July 8, 2025), consistently employing what is reasonably inferred as hostile, sarcastic, or cryptic language and lacking professional formality, demonstrate a pattern of conduct intended to harass, intimidate, and psychologically burden Plaintiff outside of the proper litigation framework.

This conduct goes beyond zealous advocacy; it constitutes extrajudicial behavior that interferes with Plaintiffs ability to focus solely on the legal merits and creates an environment of harassment. Plaintiff respectfully submits that this pattern of conduct itself warrants judicial scrutiny and stands in stark contrast to Plaintiffs own demonstrated adherence to formal meet and confer protocols, even when faced with Defendants' documented failures to engage meaningfully.

C. Plaintifrs Measured Advocacy Contrasted with Defendant's Pattern of Intimidation

Plaintiff acknowledges that robust litigation often involves sharp, critical language employed within formal pleadings to characterize adversarial conduct. Indeed, Plaintiff has used strong, yet professionally grounded, terms within his formal court filings (e.g., "endeavor to effect abject avoidance," "manipulate procedural posture to avoid accountability," "procedural integrity of the litigation," "the design of sophisticated influence") to describe what Plaintiff perceives as Defendants' strategic litigation tactics and related judicial integrity concerns. The use of such language in briefs, motions, and replies submitted to this Honorable Court for its adjudication is a fundamental and protected aspect of zealous advocacy, intended solely to persuade the Court and clarify the record.

However, Defendant Spiro's deployment of these very phrases, and others, transgresses the boundaries of proper professional conduct by appearing as informal, unsolicited, and uncontextualized extrajudicial communications sent directly to Plaintiff. These cryptic emails, notably devoid of any professional salutation or explanatory text, serve no legitimate procedural purpose related to formal meet-and-confer obligations or arguments to the Court. Instead, this pattern suggests a deliberate attempt to mock, ridicule, or sarcastically diminish Plaintiff's legitimate legal arguments through an off-record channel, or to create undue psychological pressure.

Crucially, Plaintiffs firm use of legal terminology in court filings has been to articulate perceived abuses of process and systemic issues. Plaintiff has not, in these filings or in any separate motion, sought sanctions under Rule 11 or Local Rule 83-3 for Defendants' conduct, despite what could be argued as numerous opportunities. This restrained approach stands in stark contrast to Defendants' contemplated vexatious litigant motion, which seeks punitive measures and litigation restrictions against Plaintiff for engaging in what Plaintiff views as legitimate, good-faith procedural enforcement. This distinction underscores that Plaintiffs objective is to secure judicial clarity and preserve the integrity of the record, not to harass or inappropriately burden opposing parties or the Court.

D. The Court's Recent Grant of Plaintiff's Surreply

The Court's recent granting of Plaintiff's request to file a surreply in response to one of Defendant Spiro's filings, a remedy rarely afforded in federal litigation, further undermines Defendants' attempt to paint Plaintiff as vexatious.

Surreplies are generally disfavored and only granted when a reply includes new, misleading, or inflammatory content. That the Court granted this relief strongly suggests that it was Spiro's arguments and tone that crossed procedural or ethical lines, not Plaintiff's conduct. This event alone calls into question Defendants' attempt to reverse the burden and label the responding party as abusive when, in fact, judicial intervention was necessary to allow Plaintiff a fair opportunity to respond.

II. Consistent Pursuit of Court Permission to File

Your implication of improper filings entirely disregards my consistent efforts to seek and obtain appropriate judicial authorization for my submissions. Examples include, but are not limited to:

a. I filed a formal Motion to Alter or Amend Judgment Pursuant to Fed. R. Civ. P. 59(e) (Docket 286, filed May 1, 2025), which explicitly included a request for leave to amend.

b. I submitted a Proposed Fifth Amended Complaint (Docket 310, filed May 19, 2025), expressly noting that it was a proposed amendment that would require court approval.

c. Following the Court's subsequent directive, I submitted a Corrected Proposed Fifth Amended Complaint (Docket 313, filed May 22, 2025) and a Redline Comparison (Docket 317, filed May 23, 2025), accompanied by a formal Notice of Submission of Redline (Docket 318, filed May 23, 2025). These were filed in direct compliance with the Court's May 22, 2025 Order (Docket 311).

d. I further filed a Motion for Leave to File Fifth Amended Complaint (Docket 330, filed June 13, 2025), explicitly seeking permission under Rule 15(a)(2) in response to Defendants motions.

My record clearly demonstrates that my submissions of proposed amended complaints were not unilateral acts of defiance, but rather diligent attempts to comply with evolving procedural directives and to ensure proper judicial oversight of the pleadings. To suggest otherwise is a misrepresentation of documented fact.

III. Judicial Economy and Procedural Preservation: A Necessary Pursuit, Not Harassment

My procedural clarification filings proactively assist judicial economy by explicitly addressing unresolved matters, minimizing confusion, and mitigating the risk of appellate reversal due to procedural ambiguity.

Many of the filings you disingenuously label as "burdensome" or mere "commentary," including various Notices of Judicial Preservation or Procedural Clarification, serve the critical and unassailable legal function of maintaining a clear appellate record and formally identifying procedural irregularities that would otherwise remain unaddressed and unreviewable. Such notices are neither frivolous nor improper; they are indispensable tools for ensuring judicial accountability.

As you are undoubtedly aware, the Court has yet to explicitly rule on multiple, critical FRE 201 motions, including motions that introduce dispositive judicial admissions from your own clients. These motions remain pending. My filings highlight that procedural gap not as mere commentary, but as necessary preservation of rights under Rule 54(b), Rule 59(e), Rule 60(b), and 28 U.S.C. § 455(a). Your attempt to redefine these legitimate legal filings as "burdensome" or "commentary" demonstrates a fundamental misunderstanding, or deliberate misrepresentation, of their legal function. It is not harassment to insist on judicial clarity and procedural integrity, particularly when confronted with ongoing institutional silence. Notably, I have not requested sanctions under Rule 11 or L.R. 83-3 at this stage, in good faith and in clear support of a lack of vexation.

IV. **Meet and Confer and Professional Conduct: Your Firm's Documented Evasion**

Contrary to Local Rule 7-3's explicit good-faith requirements, your firm repeatedly failed to specify concrete legal grounds in purported meet-and-confer communications, necessitating my clarifying requests.

Your accusation that I "refused to engage in straightforward meet and confer discussions" is categorically false and directly contradicted by the record. I have, in fact, documented extensive email efforts to elicit good-faith engagement from your firm and Mr. Spiro. I requested legal bases and issue narrowing not as preconditions, but as necessary context to ensure meaningful Local Rule 7-3 compliance, given your firms' historical pattern of non-specificity. It was you, or your clients, who routinely declined to specify legal grounds prior to filing. Your current email, I might add, provides more substantive information than the majority of your firm's previous purported meet and confer attempts, implicitly acknowledging the very deficiency you now falsely attribute to me. This serves as a stark reminder of your firm's documented pattern of procedural avoidance.

V. Targeting Counsel Personally: A Self-Serving and Baseless Accusation

Your reference to "targeting defense counsel" is both vague, unsubstantiated, and profoundly misleading. My references to litigation conduct, including documented emotional reactivity, misrepresentation, and procedural

gamesmanship, have been confined strictly to filings before the Court, in direct response to your clients' oppositions or observable misconduct. Critiquing documented litigation behavior in the context of judicial pleadings is not personal harassment; it is a protected and necessary component of zealous legal argument and record preservation.

I have not engaged in any extrajudicial or unprofessional attacks on any counsel. To the contrary, the record will show that you, your clients, or Mr. Spiro have repeatedly attempted to undermine my standing through baseless ad hominem characterizations and a pattern of coordinated silence, tactics now properly called into question within this very context.

VI. Caselaw in Support of Plaintiff's Posture

A. Where Plaintiff's filings are rooted in legitimate procedural concerns and new evidence, the defense's attempt to preclude filings based on volume alone violates the principle outlined in *Ringgold-Lockhart.* (See *Ringgold-Lockhart v. County of Los Angeles,* 761 F.3d 1057 (9th Cir. 2014), where the Ninth Circuit reversed a vexatious litigant order and emphasized that such orders must not chill legitimate filings, especially by pro se litigants.

"We are mindful of the dangers of overbroad restrictions on litigants. Courts must not enter pre-filing orders with undue haste because such sanctions can tread on a litigant's due process right of access to the courts." - Id. at 1061

B. Where Plaintiff has not engaged in frivolous conduct, his amendments followed judicial orders or were presented to appropriately supplement the record, and no prior warnings or sanctions have been issued, such an order would risk violating *Molski S* requirement for less restrictive remedies before pre-filing bans. (See *Molski v. Evergreen Dynasty Corp.,* 500 F.3d 1047 (9th Cir. 2007), where the Ninth Circuit upheld a vexatious litigant designation but emphasized a multi-factor test that must be satisfied, including the requirement that the litigant's filings were "harassing or frivolous" and that lesser sanctions had failed.

The plaintiff's claims must show a pattern of harassment and frivolous filings that is both numerous and without merit.

Accordingly, it is not sufficient for Defendants to rely on labels such as "voluminous" or "procedurally burdensome." They bear the burden of showing that Plaintiff's filings, many of which were compelled by Defendants' own motion practice or the Court's lack of timely rulings, were **objectively meritless.** That burden requires actual engagement with the legal and factual substance of Plaintiff's submissions.

Notably, Defendants have not undertaken such an analysis. They instead rely on conclusory assertions that the filings are "repetitive" or "improper," while avoiding the core content of Plaintiffs procedural objections, judicial notice motions, and proposed pleadings. This is an insufficient basis for invoking the extreme remedy of a vexatious litigant order.

Moreover, the record reflects that Plaintiff has successfully preserved significant procedural rights, including obtaining leave to file surreplies and filing amended complaints in full accordance with the Federal Rules. Absent a concrete showing that these filings were legally baseless and pursued in bad faith, Defendants cannot satisfy the controlling *Molski* standard, and the Court must decline to impose such extraordinary relief.

C. The current motion is premature and lacks the procedural steps required under De Long. It would fail appellate review if granted without full findings and narrower alternatives explored. (See *De Long v. Hennessey, 912 F.2d 1144 (9th Cir. 1990),* where that Court set out a four-part test for imposing a pre-filing order, which includes, *(i.)* the litigant must be given notice and a chance to be heard; *(ii.)* the court must compile an adequate record for review;(iii.) the court must make substantive findings of frivolousness or harassment; *(iv.*)he order must be narrowly tailored.

Generally, the record must show, at a minimum, that the litigant's activities were numerous or abusive enough to justify such restrictions.

D. Where Plaintiff's persistence is grounded in court delays, repeated defense Rule 12 tactics, and unresolved dispositive motions. It's not harassment but rather discipline and diligence. (See *Pavilonis v. King,* 626 F.2d 1075 (1st Cir. 1980), cert. denied, 449 U.S. 829 (1980), where the court noted that litigants cannot be punished merely for being persistent in raising claims where there are reasonable grounds.) Although presented for persuasion, the sentiment is clear that the line between persistence and abuse is not easily drawn, and must be carefully evaluated on a case-by-case basis.

E. Plaintiff's filings are based on the emergent record (Dkts. 197, 199,286, 346, etc.), and no court has deemed them frivolous, this case underscores the excessiveness of the defense's motion.(See, for persuasive application, *In re Powell,* 851 F.2d 427 (D.C. Cir. 1988), holding a pre-filing injunction is a serious remedy that should only be used in the clearest of cases, where there's a pattern of clearly meritless litigation.

F. Given that Plaintiff was granted a surreply, filed a proposed complaint with new evidence, and consistently followed procedural rules, he facially meets the *Stanley* standard for legitimate advocacy. (See *Stanley v. Woodford*, 449 F.3d 1060 (9th Cir. 2006), holding that even a pro se litigant with numerous filings cannot be preemptively barred absent demonstrated abuse.)

Filing numerous motions, some of which are successful, does not alone render a litigant vexatious.

VII. Procedural Weaponization of the Vexatious Litigant Statute: A Transparent Retaliatory Strike

It is strikingly transparent that your contemplated motion coincides precisely with my recent invocation of Rule 83-3 and my critical preservation filing, Docket 346, which documents judicial integrity concerns. This timing is not merely suspect but is likely dispositive of your true intent: you are attempting to weaponize the vexatious litigant statute to invert the burden, painting good-faith procedural enforcement as abuse, and to silence legitimate complaints about judicial and adversarial conduct. This aligns perfectly with the very pattern of procedural inversion and avoidance now meticulously documented in the Court's record. This approach is facially improper because it reasonably appears to be an attempt to silence legitimate scrutiny through the misuse of litigation tools designed to protect, not punish, procedural integrity.

VIII. Docket 347 Underscores Plaintiff's Procedural Discipline and Legitimacy of Filings

The Court's recent Order (Docket 347) itself confirms the disciplined and procedurally appropriate nature of Plaintiff's filings. While denying Plaintiff's Rule 59(e) motion, certification of interlocutory appeal, and Rule 54(b) motion, the Court notably based its denial purely on procedural posture, explicitly declining to find any frivolousness or harassment underlying Plaintiff's submissions. Specifically, the Court observed only that Plaintiff's motions were premature due to the absence of final judgment, rather than lacking substantive merit. Indeed, the Court's detailed reasoning highlights Plaintiff's filings as closely aligned with controlling procedural standards, carefully preserving rights for future appellate review and reflecting Plaintiff's legitimate, good-faith efforts to seek clarity and judicial finality. The Court's refusal to fragment appellate issues also aligns precisely with Plaintiff's previously stated concerns about procedural clarity and judicial economy. Consequently, Docket 347, the Court's most recent ruling, reinforces the absence of any basis for a vexatious litigant designation, clearly demonstrating Plaintiff's continued adherence to procedural norms and underscoring the impropriety of Defendants' contemplated motion.

IX. Conclusion

The motion you describe is unlikely to succeed on the merits, and will be met with full opposition. If filed, I will request sanctions under Federal Rule of Civil Procedure 11(c) against all signatories if it becomes clear that this motion was pursued in bad faith, as a tactical distraction, or for any improper purpose to harass or cause unnecessary delay.

To the extent your letter claims that my filings are "duplicative," "procedurally deficient," or "directed at collateral issues," that assertion is facially contradicted by the record. The amended complaints were sequentially filed in response to motions to dismiss (see, e.g., Dkts. 62, 91, 148,263,270), with leave granted where appropriate (see Dkts. 151,311), and the Fifth Amended Complaint (Dkt. 313) was expressly filed in compliance with the Court's May 22, 2025 order. Similarly, the "Notices" you cite, including Dkts. 197,241,286,329, and 342, are narrowly tailored procedural clarifications and Rule 201 filings addressing unresolved judicial notice motions and preserving procedural objections. They do not request "commentary," but instead serve the core function of preserving appellate review and identifying gaps in the judicial record. Your attempt to recast these as improper reflects a misunderstanding, or misrepresentation, of their legal purpose.

Moreover, your reliance on historical docket volume, much of which predates the Court's finding that the Third Amended Complaint complied with Rule 8, appears to be a calculated effort to distract from the current procedural posture, where the operative pleadings, judicial notice motions, and preservation filings reflect narrowly tailored, rule-compliant advocacy. I invite you to identify any single filing among those you characterize as "collateral" that has been ruled frivolous by the Court.

To be clear, I remain open to a meaningful, written exchange should Defendants wish to articulate a specific, clearly defined proposal grounded in the current procedural posture. However, I categorically oppose any pre-filing restrictions or characterization as a vexatious litigant. The record demonstrates that my filings have been made in good faith, are grounded in newly developed evidence or compelled by prior omissions and have advanced rather than hindered the resolution of the case. While I am willing to consider any discrete, non-retaliatory proposal that offers genuine mutual benefit, I will not agree to vague or pretextual conditions that serve primarily to justify a motion premised on historical distortion. If Defendants intend to make a proposal, they should do so promptly and with the level of specificity required by the Rules they purport to invoke.

I expressly reserve all rights, including the right to seek appropriate relief should your contemplated motion proceed absent a good-faith basis.

Respectfully,

Todd R. G. Hill
Plaintiff, In Propria Persona
toddryangregoryhill@gmail.com
[Quoted text hidden]

Harvey, Allison <aharvey@hbblaw.com> Tue, Jul 15, 2025 at 10:04 AM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>, Ira Spiro <ira@spirolawcorp.com>

Dear Mr. Hill,

Thank you for your response. We understand that a motion of this nature will be difficult to resolve informally. Absent your stipulation to our proposed resolution, we will proceed with filing and allow the Court to determine whether such relief is warranted.

As stated in my initial email, our motion will request the following resolution: (1) a pre-filing restriction requiring you to obtain leave of court before initiating any new filings; and (2) that you furnish $5,000 in security to cover defense fees and costs.

We understand that you view Defendants' litigation conduct-including the filing of motions to dismiss-as part of a broader pattern that you believe is improper. However, we respectfully disagree. Our clients are entitled to respond to the pleadings through the procedures set forth in the Federal Rules of Civil Procedure. Motions to Dismiss are a standard and lawful aspect of litigation practice. Exercising that right does not amount to harassment.

While we acknowledge that you have concerns regarding interactions outside the pleadings, we do not share your characterization of those events and do not believe they support the conclusion you suggest.

We also want to clarify that we disagree with your suggestion that Docket No. 346 recently 'triggered' the decision to file this motion. This motion has been under careful consideration and is based on the cumulative record in this case. We are fully prepared to file the motion today if the rules permitted filing without first completing this meet and confer process.

At this point, unless you are willing to stipulate to the proposed resolution, we will proceed with filing this motion and leave the matter for the Court's determination. This is not a decision our clients have made lightly, but it reflects the cumulative burden this litigation has imposed in terms of both time and significant expense.

Best regards,

Allison

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com> Tue, Jul 15, 2025 at 11:32 AM
To: "Harvey, Allison" <aharvey@hbblaw.com>, "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>, Ira Spiro <ira@spirolawcorp.com>

Dear Ms. Harvey, Ms. Jamshidi, and Mr. Spiro,

Thank you for your follow-up.

Your most recent message confirms what I suspected based on the tone and posture of your initial email: the outcome of this Local Rule 7-3 conference was predetermined prior to initiating contact with me. Specifically, your representation that the motion is "fully prepared" and would have been filed "today if the rules permitted" makes clear that this meet and confer process was treated not as a good-faith opportunity to resolve or narrow the issues, but as a procedural formality.

This is significant because it mirrors Defendant's previous meet and confer conduct and thus warrants preservation. This latest maneuver is not an isolated deviation; it is emblematic of the broader litigation pattern that Plaintiff has previously documented: Defendants first engage in aggressive procedural fragmentation and obfuscation and now attempt to invoke the resulting docket volume as justification for restricting Plaintiff's rights. The bond demand and vexatious litigant motion now confirmed as imminent are merely the logical extension of that strategy. This is notable because it directly supports Plaintiff's prior assertions, reflected in meet and confer documentation and procedural preservation filings, that Defendants have played a substantial, if not central, role in generating the very volume and complexity of litigation activity they now characterize as excessive. Accordingly, this tactic both confirms the adversarial pattern previously described and further warrants preservation for judicial review.

As you know, Local Rule 7-3 requires a meaningful exchange designed to avoid unnecessary motion practice. Instead, your correspondence reveals that the contemplated motion has already been drafted, that your clients have no intent to modify the relief sought, and that any response from me, regardless of substance, will be summarily disregarded. That is not a meet and confer. That is notice of filing.

While your communication now clarifies the draconian relief sought, specifically, (1) a pre-filing restriction on all future submissions and (2) a $5,000 security bond, these extreme proposals remain utterly unsupported by any substantive engagement with the actual content or legal basis of my filings. Many of these submissions were, in fact, directly compelled by Defendants' own motion practice or were critically necessary to preserve my procedural rights under the Federal Rules. Your firm continues to rely solely on docket volume and generalized narrative, conspicuously failing to demonstrate how my filings are objectively meritless or abusive under the stringent Ninth Circuit standards. Moreover, you deliberately sidestep the crucial context surrounding Docket 346 and the previous comprehensive record of Defendants' own demonstrable procedural conduct, including that of Mr. Spiro, which directly contributes to this litigation's volume and remains entirely unaddressed.

Your insistence that motions to dismiss are inherently non-harassing is a strawman. I have never argued that such motions are improper in the abstract. Rather, I have documented how the pattern, timing, and content of Defendants' procedural tactics, when combined with off-record communications and attempts to reframe procedural preservation as abuse, cumulatively support a different conclusion. You are, of course, entitled to disagree. But you are not entitled to ignore or recast the procedural posture or the evidentiary record.

I will preserve this full email exchange as part of my response to any filed motion, both to demonstrate that the meet and confer requirement was not meaningfully satisfied and to ensure the Court has a complete picture of the surrounding circumstances. Your email today will assist the Court in assessing whether the contemplated motion was the product of collaborative deliberation or adversarial reflex.

Should your clients proceed, I will oppose the motion in full. And should the motion reflect misrepresentations or an improper purpose under Rule 11 or Local Rule 83-3, I will seek appropriate relief.

I. Bad-Faith Attritional Litigation Tactic: Preemptive Framing Under Rule 11 and L.R. 83-3

While I will reserve full response for formal briefing, I must respectfully put Defendants on notice that the contemplated motion appears to be part of a broader strategy of procedural attrition rather than a good-faith invocation of Rule or statute. The motion's content, timing, and framing, particularly in the wake of various notices culminating in Docket 346, suggest a tactical maneuver designed to discourage continued protected litigation activity through threat of reputational harm, pre-filing barriers, and financial stress.

Should this motion proceed, and should the filed version continue to misrepresent the factual record, mischaracterize the legal posture, or pursue relief without basis in prevailing Ninth Circuit authority *(e.g., Ringgold-Lockhart, Molski, De Long),* I intend to seek appropriate relief under Rule 11 and Local Rule 83-3. These authorities forbid the use of court processes as instruments of harassment or distortion and permit sanctions where filings are used "for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation."

Specifically, I am presently evaluating whether Defendants' contemplated motion, particularly the security demand and characterization of my filings, may raise concerns under Federal Rule of Civil Procedure 11(b), including whether the motion is being pursued for an improper purpose or rests on misstatements of fact or law.

Consistent with the Rule 11(c)(2) safe harbor provision, I have not filed any such motion at this time. However, I am preserving the right to do so should the motion proceed in its current form without correction.

II. **Security Request Serves Tactical Function to Suppress Filings, Not Mitigate Risk**

Moreover, the demand that I post a $5,000 security bond "to cover defense fees and costs" carries implications beyond its facial purpose. In context, it functions as an implicit acknowledgment that Defendants, or their insurer(s), are under substantial financial pressure related to litigation costs. Such a request, particularly given the procedural weakness of the underlying motion, may indicate a coverage-driven concern about mounting fees, the propriety of defense counsel's billing practices, or the allocation of responsibilities among co-defendants.

This raises legitimate questions about who is bearing the costs, how those costs are being communicated and justified to the insured parties, and whether defense litigation conduct is increasing exposure unnecessarily. To the extent Haight's firm is operating under a duty to minimize exposure and cost for covered clients, the pursuit of procedurally infirm motions aimed at financial leverage may well trigger discovery relevance in later phases of this case.

III. **Plaintiff Is Not Responsible for the Costs of Defendants' Chosen Litigation Strategy**

Finally, Defendants' repeated references to docket volume and "excessive filings" overlook a critical truth: the tempo and structure of this litigation have been largely defined by the Court itself, not by Plaintiff. Defendants have collectively filed no fewer than four separate Rule 12(b)(6) motions, each triggering a procedural response. The Court has issued sequential orders, permitted amendments, and in Docket 311, explicitly invited curative briefing and submission of a proposed 5AC.

I have complied at every stage including with redlines, formal motions, and notices in accordance with Federal Rules and local practice. The Court has declined to deem any of these filings frivolous, abusive, or sanctionable. In fact, the Court granted leave for a surreply and has consistently taken Plaintiff's filings under submission, demonstrating judicial engagement and procedural legitimacy.

In this context, Defendants' attempt to recast procedural compliance as harassment is not only legally unfounded, it facially appears disingenuous. Volume is not vexation when each submission is rule-compliant, court-invited, and judicially processed. Defendants' dissatisfaction with the procedural posture cannot retroactively transform Plaintiff's filings into misconduct.

If the intent of this motion is, as it now appears, less about relief the Court is likely to grant and more about conditioning the Court's perception of me in advance of a dispositive ruling, then its strategic value to Defendants may well come at the expense of their credibility. I urge counsel to consider that procedural attrition is a tactic with diminishing returns, especially once recognized and documented.

[Quoted text hidden]
[Quoted text hidden]

EXHIBIT B

Gmail Todd Hill <toddryangregoryhill@gmail.com>

Todd Hill v. Peoples College of Law

5 messages

Kirwin, Jeffrey <jkirwin@hbblaw.com> Mon, Apr 7, 2025 at 10:33 AM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Mr. Hill,

Pursuant to Local Rule 7-3, we would like to meet and confer with you regarding your Fourth Amended Complaint. Please advise when you are able to speak today or tomorrow.

Thank you,

Jeff

Jeffrey Kirwin | Profile
Attorney
D: (714) 426-4620
jkirwin@hbblaw.com
Haight
Haight Brown & Bonesteel LLP
2030 Main Street
Suite 1525
Irvine, CA 92614
O: 714.426.4600
F: 714.754.0826
www.hbblaw.com

Todd Hill <toddryangregoryhill@gmail.com> Mon, Apr 7, 2025 at 10:52 AM
To: "Kirwin, Jeffrey" <jkirwin@hbblaw.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Dear Mr. Kirwin and Ms. Jamshidi,

Your email is noted. The purpose of a proper meet and confer under L.R. 7-3 is to clarify the specific legal grounds, factual basis, and exact relief sought, so that issues may be meaningfully narrowed or resolved before motion practice.

Your request arrives on the morning of April 7, 2025, shortly before the 12:00 PM PDT contingency deadline provided to Mr. Spiro to allow adequate preparation for a meaningful meet and confer process. It is unclear from your email whether Haight intends to engage

in a separate and distinct meet and confer process or if this effort is part of a coordinated response with Mr. Spiro.

If the intent is to engage in good faith, then providing the requisite information in advance is essential to allow a meaningful and efficient meet and confer. Accordingly, please provide the following by 12:00 PM PDT on April 8, 2025, to allow for meaningful preparation:

Detailed Legal Grounds

Please clearly articulate the specific legal grounds underlying each contemplated motion, including identification of relevant statutes, procedural rules, or controlling case law upon which you intend to rely. Unsupported and conclusory statements are not substitutes for detailed legal arguments.

Factual Basis

Summarize the factual basis for each motion, specifically identifying the allegations within the Fourth Amended Complaint (FAC) you assert are deficient or otherwise problematic. Indicate any documents or evidence you intend to rely upon to support your positions.

.fu2ecific Relief Sough!

Clearly state the precise relief or remedy sought through each motion, specifying whether your intent is the dismissal of particular claims, causes of action, or the FAC in its entirety. Clarify whether your intended motions include requests to strike portions of the FAC or seek dismissal without leave to amend.

ProP.osed StiP.ulations (If AP.P.licable).

Indicate any stipulations or agreements you propose, which might narrow or resolve disputes without court intervention. Failure to offer reasonable stipulations will be noted as evidence of bad faith.

If Haight's intent is to engage in a procedurally compliant and meaningful meet and confer process, then the provision of the above-requested information is non-negotiable. As you have initiated this request and asserted your preparedness, should you fail to provide the requested materials by 12:00 PM PDT on April 8, 2025, I will proceed accordingly, including documenting your failure to comply with L.R. 7-3 and raising the matter before the Court as necessary.

Additionally, if Haight's request is intended to coordinate with Mr. Spiro's previous request, such an effort may be documented and raised before the Court as evidence of ongoing bad faith.

Notably, Mr. Spiro's repeated refusal to provide the necessary information required under L.R. 7-3, despite numerous requests, remains unresolved. If Haight's request is intended to coordinate with Mr. Spiro's procedurally deficient approach, such an effort will be documented and raised before the Court as further evidence of ongoing bad faith.

My willingness to engage in a good faith meet and confer remains contingent upon your provision of the requested information. I am available to confer at 11:00 AM PDT on April 9, 2025, or another mutually convenient time thereafter, provided that the requested information is received by the stated deadline.

Respectfully,

Todd

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com> Tue, Apr 8, 2025 at 12:45 PM
To: "Kirwin, Jeffrey" <jkirwin@hbblaw.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Dear Mr. Kirwin and Ms. Jamshidi,

I write to follow up on your April 7, 2025 email referencing Local Rule 7-3. As of this writing, more than 24 hours later, I have received no substantive response to the specific, detailed requests I outlined to facilitate a meaningful and procedurally compliant meet and confer.

As previously explained, compliance with L.R. 7-3 requires more than a generalized request for a call. It necessitates meaningful engagement, including the identification of specific legal grounds, factual basis, and relief sought. Without this information, there is

no possibility of a productive or efficient meeting, and any such discussion would serve only to create the appearance of superficial compliance.

In the absence of a substantive response, I must conclude that Haight, like Mr. Spiro, is not prepared to engage in a good faith meet and confer process under the procedural framework required by the Court.

The originally proposed meeting time is no longer viable because, given the absence of the requested information, it would be premature to schedule a meet and confer. A productive meeting-if one is still warranted-would require clarity regarding the legal grounds, factual basis, and relief sought. Once that information is provided, I would be happy to consider availability and format. Otherwise, I will consider the current L.R. 7-3 effort incomplete and will respond accordingly to any motion filed absent compliance.

Respectfully,

Todd

[Quoted text hidden]

Kirwin, Jeffrey <jkirwin@hbblaw.com> Tue, Apr 8, 2025 at 12:49 PM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Mr. Hill,

We will not provide the detailed and lengthy information you requested. We are prepared to fully discuss the bases for our motion to strike your Fourth Amended Complaint. If you fail to engage in a meet and confer, we will advise the Court in our motion.

Thanks,

Jeff

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com> Tue, Apr 8, 2025 at 1:06 PM
To: "Kirwin, Jeffrey" <jkirwin@hbblaw.com>
Cc: "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Dear Mr. Kirwin and Ms. Jamshidi,

Your email is noted. As previously explained, compliance with Local Rule 7-3 requires meaningful engagement prior to motion practice, including the identification of the specific legal grounds, factual basis, and relief sought. This requirement exists to narrow issues, avoid unnecessary filings, and preserve judicial efficiency. *(See Carmax Auto Superstores Cal. LLC v. Hernandez,* 94 F. Supp. 3d 1078, 1084 (C.D. Cal. 2015)).

Your refusal to provide even the most basic information necessary to prepare for a discussion, while insisting that I participate in a meeting devoid of substance, cannot be reconciled with the expectations of the rule or the principles it was designed to uphold.

Notably, your April 7 email gave no indication of the subject matter or scope of the proposed call. Only now, in your April 8 response, do you disclose that your intent is to strike the Fourth Amended Complaint, without reference to legal grounds, factual basis, or proposed scope of relief. That disclosure, made after the contingent meeting window had passed and only after inquiry, reinforces the conclusion that the request was not made in good faith.

This conduct mirrors the same procedural evasion previously documented in Docket 197 and partially judicially noticed at Docket 248. A blanket refusal to provide relevant information, coupled with a demand for a call, does not satisfy L.R. 7-3 and further undermines the purpose of the rule.

I remain available to engage in a substantive and procedurally compliant discussion if and when you are prepared to meet your obligations under L.R. 7-3. Should you elect to proceed without doing so, I will respond accordingly and incorporate the documented

pattern of non-compliance.

Respectfully,

Todd

[Quoted text hidden]

EXHIBIT C

Gmail Todd Hill <toddryangregoryhill@gmail.com>

endeavor to effect abject avoidance

1 message

Ira Spiro <ira@spirolawcorp.com> Tue, Jun 17, 2025 at 10:36 AM
To: "Todd Hill (toddryangregoryhill@gmail.com)" <toddryangregoryhill@gmail.com>

endeavor to effect abject avoidance

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

"procedural integrity of the litigation"

1 message

Ira Spiro <ira@spirolawcorp.com> Thu, Jun 26, 2025 at 1:47 PM
To: "Todd Hill (toddryangregoryhill@gmail.com)" <toddryangregoryhill@gmail.com>

"procedural integrity of the litigation"

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

"manipulate procedural posture to avoid accountability"

1 message

Ira Spiro <ira@spirolawcorp.com> Sat, Jun 28, 2025 at 2:08 PM
To: "toddryangregoryhill@gmail.com" <toddryangregoryhill@gmail.com>

"manipulate procedural posture to avoid accountability"

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

Signal of procedural integrity

1 message

Ira Spiro <ira@spirolawcorp.com> Thu, Jul 3, 2025 at 5:07 PM
To: "Todd Hill (toddryangregoryhill@gmail.com)" <toddryangregoryhill@gmail.com>

Signal of procedural integrity

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

"the design of sophisticated influence"

1 message

Ira Spiro <ira@spirolawcorp.com> Tue, Jul 8, 2025 at 12:36 PM
To: "Todd Hill (toddryangregoryhill@gmail.com)" <toddryangregoryhill@gmail.com>

"the design of sophisticated influence"